



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF MISSION SUPPORT

Jerry Cook, Technical Director  
Chemical Products Corporation  
102 Old Mill Road  
Post Office Box 2470  
Cartersville, Georgia 30120

Dear Mr. Cook:

This letter is in response to the Request for Reconsideration (RFR #18001A) received by the U.S. Environmental Protection Agency (EPA) by Chemical Products Corporation (CPC) on Oct. 29, 2018. In the RFR letter, you requested reconsideration of the response that EPA provided, denying your originating Request for Correction (RFC #18001) to correct information concerning the toxicity values for 9, 10-anthraquinone (9, 10-AQ) because they do not reflect "sound and objective scientific practices" as required by the Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by the Environmental Protection Agency (IQGs). Your appeal has been considered by an Executive Panel which has reaffirmed the underlying information and conclusions reached in EPA's original response to you as appropriate and consistent with EPA's IQGs.

In accordance with the IQGs, an Executive Panel was assembled to reconsider your request. This IQG Executive Panel, which I chaired as EPA's Chief Information Officer, brought together executive members of the Office of Chemical Safety and Pollution Prevention, the Office of Water, and the Office of Policy. After carefully reviewing the RFR submitted by CPC and conducting a study quality evaluation of TR 494, EPA reaffirms that the underlying information and conclusions presented in *Provisional Peer Reviewed Toxicity Values for 9, 10-Anthraquinone (CASRN 84-65-1)* and the toxicity values for 9, 10-AQ found in the Regional Screening Level Tables are consistent with EPA's IQGs. Additionally, each of the purported deficiencies in TR 494 detailed in the CPC RFC have been specifically addressed previously by the National Institute of Environmental Health Sciences (NIEHS) in response to the RFC and RFR previously submitted by CPC to NIEHS.

EPA acknowledges the presentation you made March 20, 2019, in support of your request. EPA subject matter experts reviewed the studies and material presented and determined that no pertinent information calling into question EPA's use of TR 494 as a reference for developing the *Provisional Peer Reviewed Toxicity Values for 9, 10-Anthraquinone* was provided. Further, NIEHS has concluded separately in response to several RFC challenges to that Agency by your organization that there is no evidence of noncompliance with National Institutes of Health and Health and Human Services Information Quality Guidelines for TR 494.

The Panel determined that the challenged information has previously been peer reviewed by an external panel of subject matter experts, conducted in accordance with our IQGs, and that EPA's original response was appropriate. Therefore, the IQG Executive Panel denies your request. The determination of the IQG Executive Panel is final and concludes this IQG case.

EPA remains committed to the guidelines established by the Office of Management and Budget for maximizing the quality, integrity and reproducibility of information we disseminate to the public.

Thank you for your interest in EPA's information quality.

Sincerely,

Vaughn Noga, Chief Information Officer and  
Deputy Assistant Administrator for Environmental Information